

US Department of Health and Human Services

Privacy Impact Assessment

Date Signed:

04/21/2026

OPDIV:

NIH

Name:

CC International Caregiver

PIA Unique Identifier:

P-2990805-879711

The subject of this PIA is which of the following?

Minor Application (child)

Identify the Enterprise Performance Lifecycle Phase of the system.

Operations and Maintenance

Is this a FISMA-Reportable system?

No

Does the system include a Website or online application available to and for the use of the general public?

No

Identify the operator.

Agency

Is this a new or existing system?

New

Does the system have Security Authorization (SA)?

Yes

Indicate the following reason(s) for updating this PIA.**Describe the purpose of the system.**

International Caregiver is a web application, developed by the Department of Clinical Research Informatics (DCRI) for Social Work (SWD), to enter data for International patient's caregivers and upload related documents, such as visa and passport.

The Clinical Center (CC) accepts international patients as participants in clinical research. Patients traveling from abroad are generally required to obtain a B-2 (nonimmigrant) temporary visitor visa for medical treatment prior to entering the United States.

To support the visa application process, medical teams provide an official invitation letter outlining the patient's condition, the intent to receive treatment at the NIH, the anticipated duration of care, and, when applicable, justification for a medically necessary caregiver to accompany the patient.

In 2015, the CC Social Work Department established the International Patient Program (IPP) to streamline the B-2 visa extension process for patients and caregivers requiring an extended stay. A

formal collaboration (contract) was developed between the SWD and the Division of International Services (DIS).

When referred to the IPP, patients and caregivers provide verbal consent to the SWD Administrative Team to collect and share copies of their passports with DIS. These documents are required to verify identity and review the I-94 (Arrival/Departure Record) issued by U.S. Customs and Border Protection, which determines the authorized duration of stay.

DIS receives referrals from the NIH SWD and assists with processing extension requests prior to the expiration of the authorized stay.

Describe the type of information the system will collect, maintain (store), or share.

Information that is collected on caregivers for international patients includes name and date of birth (DOB), email address, phone number, mailing address, and financial account information. Caregiver Visa and/or Passport information are required to verify identity and review the I-94 (Arrival/Departure Record) .

The system runs queries against the Clinical Research Information System (CRIS) database to allow searching for the patient who is receiving care from the caregiver. CRIS is the authoritative source for patient data at the NIH CC and maintains its own unique privacy impact assessment (PIA), with all legal documents recorded. The data is stored in the CRIS database which is used for the generation of forms and reports.

Users log in to this system using the NIH Identity, Credential, and Access Management (IAM) Services which maintains its own unique PIA on record, including all legal authorities documented. The purpose of IAM Services is to authenticate and authorize all users and computers in a Windows domain type network; assigning and enforcing information security policies for all computers and installing or updating software. The IAM Services collect unique user credentials and stores them in an encrypted format. The IAM Services are an essential service which facilitates and governs network access to various resources.

Provide an overview of the system and describe the information it will collect, maintain (store), or share, either permanently or temporarily.

International Caregiver is a web application, developed by SWD, to enter data for international patient's caregivers and upload related documents, such as visa and passport.

Information currently exists on paper, and is sent via encrypted email between SWD and the DIS. Documentation includes information about the duration of a patient's clinical care, financial support provided to the patient, and information required by Customs and Immigration.

Information that is collected on caregivers for international patients includes name and DOB, email address, phone number, mailing address, and financial account information. Caregiver Visa and/or Passport documents are required to verify identity and review the I-94 (Arrival/Departure Record)

The system runs queries against the CRIS database to allow searching for the patient who is receiving care from the caregiver. CRIS is the authoritative source for patient data at the NIH CC and maintains its own unique PIA, with all legal documents recorded. The data is stored in the CRIS database which is used for the generation of forms and reports.

Users log in to this system using the NIH IAM Services which maintains its own unique PIA on record, including all legal authorities documented.

Does the system collect, maintain, use or share PII?

Yes

Indicate the type of PII that the system will collect or maintain.

Date of Birth
Name
E-Mail Address
Mailing Address
Phone Numbers
Medical Records Number
Financial Accounts Info
Passport Number
Visa

Indicate the categories of individuals about whom PII is collected, maintained or shared.

Public Citizens
Patients

How many individuals' PII is in the system?

<100

For what primary purpose is the PII used?

Verifying the identity of international caregivers and patients.

Describe the secondary uses for which the PII will be used.

No other uses.

Identify legal authorities governing information use and disclosure specific to the system and program.

The legal authority to operate and maintain this Privacy Act records system is 42 U.S.C. §§ 241, 248, 282 and 284

Are records on the system retrieved by one or more PII data elements?

Yes

Identify the number and title of the Privacy Act System of Records Notice (SORN) that is being use to cover the system or identify if a SORN is being developed.

09-25-0099, Clinical Research: Patient Medical Records, HHS/NIH/CC

Identify the sources of PII in the system.

Directly from an individual about whom the information pertains

In-Person
Government Sources

Identify the OMB information collection approval number and expiration date

Non-Public Information 14-355 Section 2035, exempts research conducted by NIH from Paperwork Reduction Act (PRA) requirements.

Is the PII shared with other organizations?

No

Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason.

Every patient must voluntarily execute a protocol consent and authorization prior to entry onto an intramural research protocol and treatment at the Clinical Center. In addition, each patient is provided a formal notification of Information Practices at the Clinical Center and must certify that they have been so advised.

Is the submission of PII by individuals voluntary or mandatory?

Voluntary

Describe the method for individuals to opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.

General admission and protocol consent forms are signed by each patient. Additionally, an information practices notification form is reviewed and acknowledged in writing by each patient at the time of initial admission to the CC. Enrollment in a clinical research trial is voluntary and the collection of personally identifiable information (PII) and medical notes is necessary to conduct research and provide clinical care. Therefore, a patient may not opt out of the collection or use of their PII while participating in research at the CC.

Process to notify and obtain consent from individuals whose PII is in the system when major changes occur to the system.

All patients are notified of information practices upon admission. Each patient would be advised at the time of the next admission about major system changes and the CC Information Practices Notice would be revised and provided to each patient again.

Describe the process in place to resolve an individual's concerns when they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate.

A Privacy Rights Complaint Form is available to individuals when they believe that their PII has been inappropriately used or disclosed. The CC Department of Clinical Research Informatics (DCRI) Privacy Office will review the complaint and coordinate with the NIH Office of the Senior Official for Privacy (OSOP) to respond to the concern. Complaints could also be submitted to the System Manager, who would investigate and share findings with CC Information Systems Security Officer (ISSO) and CC DCRI Privacy Office.

Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy and relevancy.

Information is checked and updated as applicable with each new encounter.

Identify who will have access to the PII in the system and the reason why they require access.

Describe the procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.

Access to PII is assigned to personnel based upon current job responsibilities.

Describe the methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job.

Appropriate access is granted to the system based on predefined roles and job descriptions, and administrative access is limited to authorized employees based on current roles. Dual factor authentication with NIH Personal Identity Verification (PIV) card and NIH IAM Services account will occur at time of login to the NIH Network. System owners are responsible for creating the proper security groups within their systems with the applicable permissions for group members to enforce least privilege.

Identify training and awareness provided to personnel (system owners, managers, operators, contractors and/or program managers) using the system to make them aware of their responsibilities for protecting the information being collected and maintained.

According to NIH policy, all personnel who manage or operate NIH applications must successfully complete annual security awareness training. Training is completed on the <http://irtsectraining.nih.gov> site with valid NIH credentials.

Describe training system users receive (above and beyond general security and privacy awareness training).

System only has a small number of users at this time, who have been oriented to the system by the development team.

Administrators and Privileged Users require additional training specific to their roles and responsibilities.

Do contracts include Federal Acquisition Regulation and other appropriate clauses ensuring adherence to privacy provisions and practices?

Yes

Describe the process and guidelines in place with regard to the retention and destruction of PII.

Records are retained and disposed of under the authority of the NIH Records Retention Schedule.

Item 03-001: Clinical Care Services Records

These records consist of clinical care services and clinical care department operational records that are consolidated under this one common temporary retention item. Exclusions and exceptions are noted and cross referenced to their appropriate item numbers within this schedule.

Disposition: Cut off annually at end of fiscal year. Destroy 7 years after cutoff. DAA-0443-2019-0001-0001

Item 03-005: Patient Medical Records.

These records document admissions and medical treatment for a patient accepted in a research project.

Disposition: Cut off patient case file annually after 5 years of inactivity. Destroy when case file is no longer needed for scientific reference. DAA-0443-2012-0007-0010

Describe, briefly but with specificity, how the PII will be secured in the system using administrative, technical, and physical controls.

Physical controls: The information technology (IT) hardware used to host protected information is located in a secured datacenter facility. The facility is only open to authorized personnel whose access is monitored by locking doors with badge readers for both ingress and egress. Each discrete ingress and egress event is logged. The facility is under 24-hour surveillance by facilities security for security and environmental hazards.

Technical Controls: IT hardware and software is segregated from public networks to prevent

unauthorized or malicious access. Access to the system is controlled by NIH login which authenticates the user prior to granting access. Access controls lists and event logs are maintained and monitored to detect unauthorized, suspicious or malicious activity. Access lists are restricted to approved IT technical personnel. Two factor authentication must be used for access. File integrity and auditing software are employed on hardware.

Administrative Controls: All technical personnel who access IT systems which contain protected information have met background investigation criteria for Public Trust positions. All personnel have taken mandatory security and privacy training classes and annual refreshers. Administrative personnel accessing these systems use privileged and separate accounts for administrative access.